

EXHIBIT B

From: Benson, Leigh Ann
Sent: Tuesday, February 25, 2020 10:40 AM
To: Seth Carson
Cc: Walton, David; La Rocca, Luke T.; Sidney Gold; Bill Rieser
Subject: RE: MEF Cases--Confidentiality Agreements/Proposed Order

Seth, please advise as to your review of the confidentiality agreements.

Leigh Ann



Leigh Ann Benson
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From: Benson, Leigh Ann
Sent: Friday, February 21, 2020 9:09 AM
To: 'Seth Carson' <seth@dereksmithlaw.com>
Cc: Walton, David <DWalton@cozen.com>; La Rocca, Luke T. <LLaRocca@cozen.com>; 'Sidney Gold' <sgold@discrimlaw.net>; 'Bill Rieser' <brieser@discrimlaw.net>
Subject: RE: MEF Cases--Confidentiality Agreements/Proposed Order

Good morning, Seth. Please advise as to whether you have any changes to the proposed confidentiality agreements and if you will join in a motion for the Barbounis matter.

Leigh ann



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From: Benson, Leigh Ann
Sent: Wednesday, February 19, 2020 7:24 AM
To: Seth Carson <seth@dereksmithlaw.com>
Cc: Walton, David <DWalton@cozen.com>; La Rocca, Luke T. <LLaRocca@cozen.com>; Sidney Gold <sgold@discrimlaw.net>; Bill Rieser <brieser@discrimlaw.net>
Subject: MEF Cases--Confidentiality Agreements/Proposed Order

Seth, we have prepared confidentiality agreements for the McNulty and Brady actions and a proposed confidentiality order for the Barbounis action. Judges Brody and Kearney ask that the parties enter into private confidentiality agreements, but Judge Wolson requires that parties submit a motion for a protective order. Please let us know if you will join such motion and if so we can take the lead on drafting it.

Leigh Ann



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